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December 22, 2022

VIA ECF

Honorable Naomi Reice Buchwald
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Abel Tirado v. City of New York, et al.
22 cv 3042 (NRB)

Dear Judge Buchwald:

As Plaintiff's counsel in the above-referenced matter, I write with Defendants' consent to respectfully request an extension to file Plaintiff's motion for costs and attorney's fees. This is Plaintiff's first request for an extension to file the fee application in this matter. The reason for this request is that the parties need more time to negotiate and, hopefully, resolve the issue of fees and costs in this matter. Because Judgment pursuant to Rule 68 was entered on December 19, 2022 (ECF No. 13), Plaintiff's application for fees and costs is presently due on January 2, 2023. Plaintiff respectfully requests February 1, 2023 as the date by which he must file his fee application. If the parties resolve the issue of fees and costs before then, they will promptly inform the Court.

Thank you for your time and consideration in this matter.


Sincerely,



Cyrus Joubin, Esq.

Application granted.

SO ORDERED.



NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
December 23, 2022